

From: Vickery, Adrienne
Sent: Wed, 23 Feb 2022 15:56:01 -0500
To: Hughes, Kelley
Subject: FW: Timeline of events EEMO

Hi Kelley! Hope all is well. Can you share the wording of this with me that you sent to the banks?

Feb 22nd:

RCMP communicated with all financial institutions recipients of the various information disclosures regarding potential Designated Entities that the RCMP no longer believes that those entities are engaged in conduct or activities prohibited under the EMR/EEMO. Therefore disclosed entities no longer meeting the criteria of a designated person. Information is being shared so financial institutions can take proper posture on currently frozen assets.

From: Hughes, Kelley <Kelley.Hughes@rcmp-grc.gc.ca>
Sent: February 23, 2022 2:22 PM
To: McDonald, Ian <ian.mcdonald@rcmp-grc.gc.ca>; Chaves, Francisco <Francisco.Chaves@rcmp-grc.gc.ca>; Bender, Jeff <Jeff.Bender@rcmp-grc.gc.ca>; Bernard, Gina <Gina.Bernard@rcmp-grc.gc.ca>; Scherbluk, Darian <Darian.Scherbluk@rcmp-grc.gc.ca>
Cc: MacAulay, Luke <luke.macaulay@rcmp-grc.gc.ca>; Vickery, Adrienne <adrienne.vickery@rcmp-grc.gc.ca>
Subject: RE: Timeline of events EEMO

There's nuance in that number....all the disclosures, except for 2, were technically linked to vehicle observations, but the cover pages SII included specified the disclosure was related to an individual or entity (i.e. corporation), which generally coincided with registered owners. 1 disclosure however, although originally linked to a vehicle, we counted as an individual due to the nature and timing of the disclosure. The disclosures themselves in some cases had information to support other entities meeting the definition of a designated person under the Order as well. So, the number of individuals and vehicles reported really relates to number of "packages" received from SII and subsequently disclosed. The financial entities could use the information therein to determine what action, if any, they would take, and against who, but my task wasn't to review or pull that additional information out; it was simply to be a conduit.

Happy to chat more on that point if needed...

From: McDonald, Ian <ian.mcdonald@rcmp-grc.gc.ca>
Sent: February 23, 2022 1:36 PM
To: Chaves, Francisco <Francisco.Chaves@rcmp-grc.gc.ca>; Bender, Jeff <Jeff.Bender@rcmp-grc.gc.ca>; Bernard, Gina <Gina.Bernard@rcmp-grc.gc.ca>; Scherbluk, Darian <Darian.Scherbluk@rcmp-grc.gc.ca>
Cc: MacAulay, Luke <luke.macaulay@rcmp-grc.gc.ca>; Hughes, Kelley <Kelley.Hughes@rcmp-grc.gc.ca>

Vickery, Adrienne <adrienne.vickery@rcmp-grc.gc.ca>

Subject: RE: Timeline of events EEMO

Just following up after a quick confirmation with Fran (thanks for getting this put together Fran), in the breakdown of entities, the numbers of individuals disclosed by SII is 3.

Ian

From: Chaves, Francisco <Francisco.Chaves@rcmp-grc.gc.ca>

Sent: February 23, 2022 1:02 PM

To: Bender, Jeff <Jeff.Bender@rcmp-grc.gc.ca>; Bernard, Gina <Gina.Bernard@rcmp-grc.gc.ca>;

McDonald, Ian <ian.mcdonald@rcmp-grc.gc.ca>; Scherbluk, Darian <Darian.Scherbluk@rcmp-grc.gc.ca>

Cc: MacAulay, Luke <luke.macaulay@rcmp-grc.gc.ca>; Hughes, Kelley <Kelley.Hughes@rcmp-grc.gc.ca>;

Vickery, Adrienne <adrienne.vickery@rcmp-grc.gc.ca>

Subject: Timeline of events EEMO

Hi all,

As mentioned this is the various sequencing of events and major point of information. I laid it out per day to provide you give all the pertinent information to build a broad view of how things occurred. Here are some things for you to consider:

- Refer to the “issues raised” throughout the email to give an appreciated of when things were brought up
- Notice how our communication to the banks remained the same regarding their onus to determine to act on an ‘entity’
- I’m attaching a media response that explains some aspects regarding ‘entities’ and other things. For your consideration.
- FI’s reported to the RCMP throughout this process their actions on accounts.
- RCMP – FI’s were in constant communication throughout this whole time.

Current Numbers

- Disclosures to date: 57 entities (18 individuals + 39 vehicles – including owner/drive info)
- Disclosed to: Banks, Canadian Bankers Association, IIROC, CSA, MFDA and Credit Unions.
- Accounts Frozen: 242 financial products (219 financial products have been or are about to be frozen; 23 financial products proactively frozen)
- Cryptocurrency: 253 bitcoin addresses shared with virtual currency exchangers.

Breakdown of entities

- Designated Persons information from OPP/OPS: 15 individuals thus far.
- Designated Entities information from RCMP SII: 41 thus far (39 vehicles, 2 individuals).

Sequencing of events:

Feb 10th: 2022: RCMP FC had started engaging with PoJ (OPS/OPP) to offer our assistance if they needed it. Up to this point RCMP did not have jurisdiction to actively participate on enforcement, however it was having conversation to keep up with situational awareness A bit more on FC's passive actions (none of these were started as result of direct tasks);

- FC has kept the lines of communication with GoC partners, PoJ and private sector open for awareness and support if necessary. No active involvement.
- FP Financial Crime assessed that there still is no criminality in the money thus far (because we have not been privy to evidence that shows a fraud, bribery, corruption, etc. is happening). If we look at this currently, people are allegedly donating to individuals who then commit mischief- that is provincial enforcement, which we have seen happen in Ontario and we know that Alberta (provincial) RCMP is looking into.

On Feb 14th FPCO FC had a conversation with reps of one banking institution looking for some guidance information regarding potential powers that would be enacted that day. Banking institutions looking for coordinated approach, indicating that they are seeing financial movement in relation to crowdfunding and they will only share information within the boundaries of legal frameworks. FPCO FC was not aware of any imminent powers and will touch base once clear direction is given to the RCMP.

Feb 15th

Meeting with reps from the Financial Institutions (14h00).

RCMP: Supt Bradshaw, DG and Supt Beaudoin, Dir
Banks: combination of Corp Security and CAMLOs

Key takeaways:

- RCMP informed the FI's that Emergency Measures Act was imminently going to be signed today.
- Informed that RCMP will provide names of entities as soon as the act is signed off (as early as tonight).
- RCMP will provide a central point of contact that will channel the names of the entities to the FI's.
- The FI's proposed the 'Grid Alert' process, under the Canadian Bankers Association (CBA), as a means to share information to them. Another possibility to share would be direct email communication to their 'Legal Order' inbox. The FI's will discuss among themselves, along with consulting their legal departments, as to what is the best way to channel information to them and inform the RCMP NHQ within the following hours. Banks provided one point of contact.
- The FI's asked whether the onus of reporting information or acting on EMA obligations relied on them. RCMP reps indicate that the banks have the onus of detecting and freezing assets such as they identify client entities. Identification of entities should be done based on the criteria's set on the EMA.

- Regarding the freezing of assets, RCMP reps highlighted that the measures are not about confiscation but rather disruption. To this effect, it was suggested that asset should be frozen as long as the emergency measures are in effect.
- FI's were concerned about scenarios where 'joint accounts' could be frozen, thus impacting individuals not involved in the protests.
- RCMP highlighted that law enforcement could resort the EMA at different stages regionally depending on how removal of protest evolves. FI's acknowledged the fact that their actions under the act could affect LE's negotiations in the field.

Meeting with Fed CROPS (15h30)

RCMP: Supt Bradshaw, DG and Supt Beaudoin, Dir

Key takeaways:

- RCMP reps informed CROPS officers about the imminent coming into effect of the EMA. CROPS officers were informed that the act puts the onus on the financial institutions to identify, report and freeze assets as it applies to the scope of the act. At this moment, it is not well known what type of information the banks will provide back to law enforcement or FINTRAC, however information is expected to flow fairly soon.
- CROPS officers were informed that the first wave of disclosures to the financial institutions regarding entities involved in the protest is expect to occur this evening.
- The RCMP and the OPP/Ottawa Police have been in conversations to help streamline the request into the banks. As such, the OPP has accepted to use NHQ as conduit to communicate and share information with the banks. CROPS officers were encouraged to get in contact with their provincial counterparts to help streamline the information flow into the banks. Officers were encouraged to refer to the act in order to determine if the act covers any situations that might be taking place in their region.
- NHQ recognized that certain jurisdictions may not result to the measures in the act and the removal and negotiation with the protestors in their region continues.
- RCMP will have one point of contact with the banks.
- NHQ highlighted that the freezing of assets is not the same as asset confiscation and the onus lies at the financial institutions to identify, report and acting while the act in under effect.
- In order to assist with due diligence and intelligence preparation before disclosing other entities names, National division SII has agreed to stand up a team that will coordinate with Ottawa Police Services/OPP. OPP will deploy a surveillance team to obtain intel on target vehicles/individuals.

Meeting with FINTRAC Reps (17h00)

RCMP: Supt Bradshaw, DG

Meeting to inform FINTRAC that act was going to most likely be enacted tonight and the RCMP and banks have agreed to a channel of communication.

RCMP internal discussions on concerns:

What are the mechanism to change the freezing of assets after initial info sharing if the results of the frozen assets are having an unintended, negative impact on ops?

In order to mitigate unintended negative impacts on on-ground operations, RCMP asked the banks to share any proactive actions on assets freezes.

EMA / EEMO published in the Gazette at 21h00

Feb 16th

RCMP shared 14 Designated Persons (Individuals) with major banks. The list was gathered by the OPS.

RCMP shared 24 cryptocurrency addresses with the cryptocurrency exchanges that had been traced through publically available information. They have a value of over 1.2 M. Another individual was added the following day.

Meeting with CAMLOS:

- RCMP mentioned that at this time Ottawa remains the only pressure point in the country. So disclosures center around Ottawa.
- The Act does not include municipal partners, and perhaps the OPP and another provincial partner.
- RCMP indicated to the banks that the law is active as of it's passing. It is not retrospective.
- The banks will leverage the list provided by the RCMP and ingest. Upon reviewing their own holdings, the banks need to assess if those people meet the definition of a designated person before moving to freeze.
- If the banks don't see any activity as to link those individuals to the convoy, then the bank may simply report the individual to the RCMP without acting the Order. As such time, the RCMP may provide further information to the banks.

Issues raised:

Financial institutions are wondering if there is a mechanism in place where law enforcement can update the list of Designated Persons in order to determine when a person should no longer be affected by the Order. The recipients were informed of the Emergency Measures Act, their obligation not to facilitate any transactions involving these Bitcoin addresses, and to report to the RCMP if any attempt was made to convert the cryptocurrency to cash through one of their

exchanges. No private information nor any Protected Information was shared. Essentially this is the equivalent of providing the MSB with serial numbers of known illicit cash.

Feb 17th

Information disclosed included Banks, Canadian Bankers Association, Credit Unions.

The level of action already taken (restricting/freezing assets) varies between the banks. Some banks have flagged accounts, others have restricted flows, while some others are still determining the steps to follow. **Solicitor-Client Priv.** RCMP offered to go back to the OPP to obtain a letter that would provide some extra supporting information that would allow the banks to proceed on their actions.

Banks requested clarity as to whether any information (or lists) from LE should be enough to impose asset restrictions/freeze. RCMP clarified that the onus is on the bank to do their due diligence on top of any information provided by the RCMP before acting.

Issues raised:

Overall, the banks are keeping a close eye in the overall 'trust of the banking system' so they are not seen as an arm of the government. Finance is aware of this concern

Feb 18th

RCMP disclosed the names of all entities to the Mutual Fund Dealers Association.

RCMP Financial Crime is fielding many inquiries from financial institution regarding persons with frozen accounts moving off the protest.

RCMP shared a new Crypto ALERT (2nd) to inform 10 different cryptocurrency ATM operators which run the Bitcoin ATM machines in Ottawa about the 103 bitcoin addresses (wallets) that have received the disbursement of funds. Direct information sharing with three crypto exchangers was done regarding bitcoin addresses associated with the funding of the convoy.

Meeting with CAMLOS

- Many donors to this cause are calling the banks to determine if they will be affected. RCMP confirmed that the spirit of the law is not to target donors, but instead individuals currently physically in the protest. The law is not retroactive, is it for the current situation.
- Banks raised concerns regarding physical security at their branches due to the freezing of accounts (retaliation for the public or impacted individuals)

Feb 19th

An additional Cryptocurrency ALERT (3rd) containing 114 addresses was issued to the crypto exchangers/MSB last evening. The organiser of the HonkHonkHodl cryptocurrency crowdfunding campaign posted on social media that he had disseminated the funds to the truckers. He posted five videos of himself turning the cryptocurrency seed phrases to the truckers in envelopes.

Feb 20th

- Banks continue to inquiry about unfreezing financial products and seeking information to properly apply EEMO.
- RCMP is engaged in internal conversations to determine how to assist financial institutions to lift EEMO
- No new disclosures of information sent to financial institutions from RCMP

Feb 21st

FPCO-FC has provided information received from financial institutions to the OPP regarding their investigation into crowdfunding, which included information about financial activity in violation of a court order.

On Feb 21, 2022 DCFP reported to media : the freezing of 206 financial products, and what I mean by financial products would be bank accounts, corporate account, the disclosure of 56 entities, vehicles, individuals, companies, the addresses of 253 bitcoin shared with virtual currency exchangers, and the proactive freezing of an account of a payment processor for a value of \$3.8 million by financial institution.

Feb 22nd:

RCMP communicated with all financial institutions recipients of the various information disclosures regarding potential Designated Entities that the RCMP no longer believes that those entities are engaged in conduct or activities prohibited under the EMR/EEMO. Therefore disclosed entities no longer meeting the criteria of a designated person. Information is being shared so financial institutions can take proper posture on currently frozen assets.